

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

IN RE TEXTRON, INC. ERISA
LITIGATION

Civil Action No. 09-383-ML
(Consolidated Actions)

THIS DOCUMENT RELATES TO:
ALL ACTIONS

DECLARATION OF PLAINTIFF ALMA I. PEREZ

I, Alma I. Perez, make this Declaration pursuant to 28 U.S.C. § 1746:

1. I am one of the named Plaintiffs in this action and a resident of the state of California. I am a former employee of Textron, Inc., where I worked from April 2003 until April 2009.

2. I submit this Declaration in support of Plaintiffs' motion for approval of the proposed settlement and fee and expense application.

3. While I was employed by Textron, Inc., I was a participant in the Textron Savings Plan (the "Plan"). I was a Plan participant during the Class Period. During the Class Period, my Plan account contained Textron's company stock.

4. I am represented by Milberg LLP. I understand that the Court appointed Milberg LLP, as Interim Lead Counsel for all of the ERISA Plaintiffs and that Milberg works with other plaintiffs' counsel to prosecute this case (together, "Plaintiffs' Counsel"). I believe that these firms will and have vigorously represented the interests of the Class.

5. After careful consideration, I agreed to serve as one of the named plaintiffs. I understand that among other things, this case was brought as a class action lawsuit against

Textron, Inc. and the other defendants to recover losses to the Plan as a result of the Plan's investment in the stock of Textron during the Class Period.

6. After I agreed to serve as a named plaintiff in this case, I conferred regularly with my counsel, including numerous telephone calls and in-person meetings. I have also responded to questions and requests for information from counsel.

7. I understood at the time that I agreed to participate as a named plaintiff that I may have to appear for a deposition and give testimony in this action. On June 8, 2012, I travelled to New York, New York. On June 10, 2012, I travelled to Providence, Rhode Island. I was deposed on June 11, 2012. My husband, Miguel Perez, was also deposed. We travelled back to California in the evening of June 11, 2012. As a result, I missed three days of work.

8. I also understand that were the case go to trial I would have to travel and give testimony live before the fact-finder.

9. During the course of the litigation, I participated in the following activities: (i) reviewing documents such as Plan-related documents and other materials; (ii) reviewing and approving other court documents and discussions with my counsel in connection therewith; (iii) regular update communications with counsel concerning the status and strategy of the action; (iv) searching my own files for Textron related documents and sending what I found to my counsel; (v) regular updates with my counsel about responding to discovery request and the progress of same; (vi) preparing for and sitting for a deposition; (vii) communications with my counsel about the proposed settlement talks to be held in an attempt to settle this case; and (viii) review and approval of the terms of the proposed settlement. I approached each of these tasks with diligence, focus, and commitment.

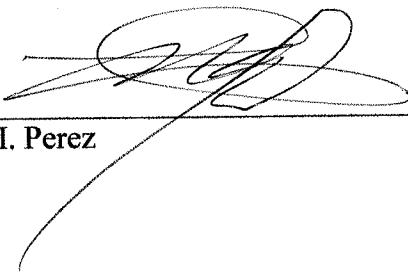
10. I believe that the proposed settlement is in the best interests of the Class and would ask the Court to approve such settlement. I am aware that the proposed settlement as well as the attorneys' fee and expense application is subject to court approval. As of this date, I am unaware of any person who objects to the foregoing.

11. I have reviewed my records of my communications with Plaintiffs' Counsel and the volume of court papers and other materials I reviewed. I estimate that my total time devoted to this litigation, including all of my phone calls, emails and other correspondence with Plaintiffs' Counsel, reviewing the pleadings and other court papers in the case, searching for and producing to Plaintiffs' Counsel whatever case-related documents I had in my possession, responding to document requests, interrogatories and related follow-up requests for discovery; preparing and appearing for deposition, together with the time I spent consulting on and reviewing the terms of the proposed settlement and the written settlement papers, involved at least 75 hours of my time.

12. For all the foregoing reasons, I respectfully request that this court grant the motion seeking approval of the settlement, fee and expense application and case contribution award.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 31, 2013


Alma I. Perez